

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ENCOMPASS INSURANCE COMPANY OF)	
MASSACHUSETTS,)	
)	
Plaintiff-Counterclaim Defendant,)	
)	
v.)	
)	
JOSEPH D. GIAMPA, FREDERICK T.)	Case No. 05-11693 RCL
GIAMPA, ADVANCED SPINE CENTERS, INC.)	
d/b/a FIRST SPINE REHAB, FUTURE)	
MANAGEMENT CORPORATION, FUTURE)	
MANAGEMENT BUSINESS TRUST, EDWARD)	
KENNEDY, BRIAN J. CULLINEY, D.C. and)	
JENNIFER MCCONNELL, D.C.,)	
)	
Defendants.)	
_____)	

**MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF'S MOTION TO
COMPEL ANSWERS TO INTERROGATORIES**

Now comes the Defendant FUTURE MANAGEMENT CORP. (hereinafter "FMC") and, pursuant to Fed.R.Civ.P. Rule 37 and Local Rule 37.1, opposes Plaintiff's Motion to Compel further answers to Interrogatories.

Plaintiff's Memorandum in Support of its Motion to Compel relates only to Interrogatory #9 directed to Advanced Spine Centers Inc.

The Court is respectfully directed to Advanced Spine Centers Inc.'s Opposition to Plaintiff's Motion to Compel.

As the Plaintiffs have not sought any further responses to interrogatories from FMC, this Motion must be denied.

For the foregoing reasons, the Defendant respectfully requests that the Court deny the Plaintiff's Motion to Compel.

Respectfully submitted,

FUTURE MANAGEMENT CORP.
By their attorney,

Matthew J. Conroy (BBO# 566928)
BELESI & CONROY, P.C.
114 Waltham Street
Lexington, Massachusetts 02421
(781) 862-8060

Dated: July 22, 2007

CERTIFICATE OF SERVICE

I, Matthew J. Conroy do hereby certify that a true and accurate copy of the foregoing was served on all counsel of record by mailing a copy of the same 1st class US Mail, postage prepaid this 23d day of July 2007.

s/s Matthew J. Conroy
Matthew J. Conroy

Dated: July 23, 2007